

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA

LACAZE LAND  
DEVELOPMENT, LLC  
Plaintiff  
v.

DEERE & COMPANY, INC. and W.L.  
DOGGETT, LLC, D/B/A DOGGETT  
MACHINERY SERVICES  
Defendants

CIVIL ACTION NO. 1:19-cv-01477  
CHIEF JUDGE DEE D. DRELL  
MAG. JUDGE PEREZ-MONTES

**COUNTERCLAIM OF W.L. DOGGETT, LLC D/B/A DOGGETT MACHINERY  
SERVICES AGAINST LACAZE LAND DEVELOPMENT, LLC**

NOW INTO COURT, through undersigned counsel, comes Defendant, W.L. Doggett, LLC d/b/a Doggett Machinery Services (“Doggett”) who respectfully represents:

1.

Made Defendant in this counterclaim is Lacaze Land Development, LLC (“Lacaze”), a Louisiana limited liability company authorized to do and doing business in Louisiana.

2.

On or about August 2, 2019, Lacaze executed a promissory note in favor of Doggett for the amounts owed to Doggett for amounts for the rental of equipment between August 14, 2018 and February 12, 2019 (the “Note”).

3.

The original principal amount of the Note is Three Thousand Five Hundred Forty-Six and 73/100 (\$3,546.73) Dollars, payable at the rate of Five Hundred (\$500.00) Dollars per month beginning on August 15, 2019 and continuing monthly thereafter until paid in full.

4.

Lacaze failed to make payments as necessary under the Note and is in default.

5.

Per the Note, Lacaze is liable for attorney fees associated with this action in the amount of twenty-five percent (25%) of the amount due and sued for.

6.

Lacaze owes Doggett Two Thousand Five Hundred Forty-Three and 73/100 (\$2,543.73) Dollars, plus interest at the judicial rate of interest from date of judicial demand, attorney fees, and costs of this proceeding.

7.

Doggett reserves the right to file additional amended and/or supplemental counterclaims as the facts of this matter may later disclose and require.

**WHEREFORE**, premises considered, W. L. Doggett, LLC d/b/a Doggett Machinery Services respectfully requests that judgment be entered in its favor and against Lacaze Land Development, LLC on its counterclaim for all amounts due and owing under the Note, together with judicial interest from date of demand, attorney's fees and court costs.

Respectfully submitted:

**McGlinchey Stafford PLLC**

/s/Zelma M. Frederick

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*Attorneys for Defendant W.L. Doggett, LLC*

*d/b/a Doggett Machinery Services*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel by operation of the court's electronic filing system.

Baton Rouge, Louisiana, this 30th day of April, 2020.

/s/Zelma M. Frederick

Zelma M. Frederick